



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007

June 15, 2020

**VIA ECF**

Honorable George B. Daniels  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**SO ORDERED:**

*George B. Daniels*  
George B. Daniels, U.S.D.J.

Dated: JUN 17 2020

Re: *Bryam Mendoza v. Decker, et al.*, 20 Civ. 4375 (GBD)

Dear Judge Daniels:

This Office represents the government in the above-referenced habeas action brought under 28 U.S.C. § 2241 by petitioner Bryam Mendoza ("petitioner"), an alien in civil immigration detention at the Bergen County Jail located in Hackensack, NJ. The government's opposition in response to the habeas petition and motion for an order to show cause, preliminary injunction, and a temporary restraining order (the "TRO Motion") is due June 17, 2020. *See* ECF No. 3. I write respectfully to request permission to file under seal the petitioner's medical records from the Bergen County Jail. Petitioner's counsel consents to this request.

Although Rule 1.D of the Court's Individual Rules and Practices specifies that prior permission of the Court is not required to file certain documents (including medical records) under seal, the ECF filing system appears to contemplate that a party seeking to file under seal must reference a court order authorizing a sealed filing. The government therefore respectfully requests that the Court grant leave to file the petitioner's medical records under seal on ECF.

I thank the Court for its consideration of this request.

Respectfully,

GEOFFREY S. BERMAN  
United States Attorney for the  
Southern District of New York

by: /s/ Rebecca R. Friedman  
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cc (via ECF): Counsel for Petitioner